

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DISTRICT

FILED

AUG 28 2024

**U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JERVONZ L. WILLIAMS and
EMMA M. CUNNINGHAM,

Defendants.

4:24CR450 MTS/NCC

INDICTMENT

The Grand Jury charges the Defendants as follows:

COUNT ONE

**18 U.S.C. §§ 1201(a)(1); 18 U.S.C. § 2
(Attempted Kidnapping)**

On or about August 5, 2024, in the City of St. Louis, within the Eastern District of Missouri,

**JERVONZ L. WILLIAMS and
EMMA M. CUNNINGHAM,**

aiding and abetting one another, unlawfully seized, confined, kept, and detained I.S. against her will, and attempted to hold I.S. for reward or otherwise, and in furtherance of the commission of this offense, used any means, facility, or instrumentality of interstate commerce—in violation of Title 18, United States Code, Section 1201(a)(1) and (d).

COUNT TWO

**18 U.S.C. § 922(g)(1)
(Possession of a Firearm by a Convicted Felon)**

On or after February 20, 2024, including March 13, 2024, and continuing through August 7, 2024, in the City of St. Louis, within the Eastern District of Missouri, the defendant herein,

JERVONZ L. WILLIAMS,

knowing he previously had been convicted of one or more crimes punishable by a term of imprisonment exceeding one year, knowingly possessed one or more firearms, which had traveled in interstate or foreign commerce—in violation of Title 18, United States Code, Section 922(g)(1).

COUNT THREE
18 U.S.C. § 922(d)(1)
(Transfer of a Firearm to a Convicted Felon)

On or after February 20, 2024, but before August 7, 2024, in the City of St. Louis, within the Eastern District of Missouri, the defendant herein,

EMMA M. CUNNINGHAM,

knowingly disposed of, transferred, and granted control over a firearm to Jervonz L. Williams despite knowing and having reasonable cause to believe that he previously had been convicted of a crime punishable by a term of imprisonment exceeding one year—in violation of Title 18, United States Code, Section 922(d)(1).

COUNT FOUR
18 U.S.C. § 922(a)(6)
(Making a False Statement in Connection with the Purchase of a Firearm)

On or about February 20, 2024, in St. Louis County, within the Eastern District of Missouri, the defendant herein,

EMMA M. CUNNINGHAM,

in connection with the acquisition of a firearm from a federally licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made one or more false written statements on a Firearms Transaction Record (ATF Form 4473) that were intended or likely to deceive the dealer with respect to any fact material to the lawfulness of the sale of the firearm—in violation of Title 18, United States Code, Section 922(a)(6).

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Section 922(a)(6) and (g)(1) as set forth above, the Defendants shall forfeit to the United States of America any firearm or ammunition involved in or used in said violation(s).

2. If any of the property described above, as a result of any act or omission of the Defendants

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL

FOREPERSON

SAYLER A. FLEMING
United States Attorney

ZACHARY M. BLUESTONE, #69004MO
Assistant United States Attorney